

1 JEFFREY N. LABOVITCH (NBN: 10915)  
2 jlabovitch@nicolaidesllp.com  
3 NICOLAIDES FINK THORPE  
MICHAELIDES SULLIVAN LLP  
4 4365 Executive Drive, Suite 950  
San Diego, CA 92121  
Telephone: (858) 257-0700  
Facsimile: (858) 257-0701

5  
6 KEVIN E. HELM (NBN: 3432)  
KevinH@helmandassociates.net  
7 HELM & ASSOCIATES  
2330 Paseo Del Prado, Suite C103  
8 Las Vegas, NV 89102  
Telephone: (702) 258-0022  
9 Facsimile: (702) 258-0114

10 *Attorneys for Defendants*  
11 *Granite State Insurance Company and*  
*National Union Fire Insurance Company of Pittsburgh, Pa.*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 FOREMOST SIGNATURE INSURANCE  
COMPANY, a Michigan corporation duly  
15 licensed to sell and administer insurance  
in The State of Nevada,

16 Plaintiff,  
17 v.

18 GMUENDER ENGINEERING, LLC, a  
Nevada limited liability company; JOSEF  
C. GMUENDER, a professional engineer;;  
21 WILLIAM HUBER, parent and guardian of  
Ashley Huber and Taylor Huber,  
individually and as surviving children of  
22 Kelly Huber, deceased; GRANBY  
REALTY HOLDINGS, LLC, a Colorado  
limited liability company; GRANBY  
RANCH AMENITIES, LLC; GRANITE  
STATE INSURANCE COMPANY, an  
Illinois corporation; NATIONAL UNION  
FIRE INSURANCE COMPANY OF  
PITTSBURGH PA, a Pennsylvania  
corporation,

28 Defendants.

Case No. 3:19-cv-00508-MMD-CBC

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME  
TO FILE RESPONSIVE PLEADING TO  
AMENDED COMPLAINT FOR  
DECLARATORY RELIEF [ECF 48]**

**(First Request)**

1 Defendants/Counterclaim and Cross-Claim Plaintiffs, GRANITE STATE  
2 INSURANCE COMPANY (“Granite State”) and NATIONAL UNION FIRE INSURANCE  
3 COMPANY OF PITTSBURGH, Pa. (“National Union”), by and through its attorneys of  
4 record, NICOLAIDES FINK THORPE MICHAELIDES SULLIVAN LLP and  
5 Plaintiff/Counterclaim Defendant, FOREMOST SIGNATURE INSURANCE COMPANY  
6 (“Foremost”), by and through its counsel of record, CHRISTIAN, KRAVITZ, DICHTER,  
7 JOHNSON & SLUGA, LLC hereby stipulate and agree to extend the deadline for  
8 Granite State and National Union to file their responsive pleading to Foremost’s  
9 Amended Complaint for Declaratory Relief (ECF 48)(“the Amended Complaint”) to and  
10 including July 2, 2020.

11 This stipulation is submitted in compliance with LR IA 6-1. On June 8, 2020, the  
12 Court granted Foremost’s Motion for Leave to File an Amended Complaint. Foremost  
13 filed its Amended Complaint the same day, making Granite State’s and National  
14 Union’s response due June 22, 2020. Good cause exists for the requested extension  
15 as Granite State, National Union, and their counsel are operating remotely due to  
16 preventative measures instituted at their normal places of business to limit the spread  
17 of COVID-19. Because of remote work measures, additional time for attorney-client  
18 coordination and analysis is required. The Parties to this stipulation agree that  
19 additional time is appropriate to fully evaluate and respond to the Amended Complaint.

20       ///

21       ///

22       ///

23       ///

24       ///

25       ///

26       ///

27       ///

28

1 This is the parties' first request for an extension of the response deadline to the  
2 Amended Complaint.

3 Dated: June 18, 2020

NICOLAIDES FINK THORPE  
MICHAELIDES SULLIVAN LLP

5 By: /s/ Jeffrey N. Labovitch  
6 Jeffrey N. Labovitch  
7 Nevada Bar No. 10915  
8 4365 Executive Drive, Suite 950  
9 San Diego, CA 92121  
*Attorney for Defendants/Counterclaim and*  
*Cross-Claim Plaintiffs Granite State*  
*Insurance Company and National Union*  
*Fire Insurance Company of Pittsburgh, Pa.*

10 Dated: June 18, 2020

11 CHRISTIAN, KRAVITZ, DICHTER,  
12 JOHNSON & SLUGA, LLC

13 By: /s/ Gena L. Sluga  
14 Gena L. Sluga  
15 Nevada Bar No. 9910  
16 8985 South Eastern Avenue, Suite 200  
Las Vegas, NV 89123  
*Attorney for Plaintiff/Counterclaim*  
*Defendant Foremost Signature Insurance*  
*Company*

17  
18  
19 **ORDER**

20 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

21 Dated this 18TH day of June, 2020.

22   
23 UNITED STATES MAGISTRATE JUDGE